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in veterinary regulation.

# Consultation Summary

## **Draft Standards for Veterinary Facilities in Ontario & Annual Accreditation Fee**

## **INTRODUCTION**

Facility Accreditation is an integral part of the College's quality practice program, ensuring veterinary facilities provide a professional environment and contain the essential equipment required for patient care. There are currently 1700 veterinary practices operating 2400 facilities (including mobiles) in Ontario. All veterinary facilities must meet the requirements described in the Minimum Standards for Veterinary Facilities in Ontario.

The College Council, under section 8 of the Veterinarians Act, establishes standards for veterinary facilities which must be met to qualify for the issuance or renewal of a certificate of accreditation.

## **BACKGROUND**

In June 2014, Council established an Accreditation Models Task Force (AMTF) which was appointed to complete a review of current and emerging models for facility accreditation with an aim to assuring public safety and supporting the delivery of quality professional services in the future.

In October 2015, the AMTF made recommendations to Council on a cost-effective contemporary model for facility accreditation and an inspection process which would be effective, flexible, and responsive to the evolution of veterinary medicine. Council supported the proposed model recommended by the AMTF because this facility accreditation model is driven by the opportunity to enhance standards within the veterinary profession that reflect the services and scopes of practice that are relevant to a specific facility.

There are several reasons for moving to a new accreditation model and new facility standards:

- The current model assumes that a full scope of services is being provided and restricts the facility to treating only one species type (companion animal, equine, food-producing animals, or poultry).
- Over the past 30 years, the practice of veterinary medicine has evolved, and scopes of practice are changing. Some practices have narrowed the scope of services they provide. Some practices have broadened their scope of practice to treat multiple species.
- To narrow their scope or treat multiple species, the current model is cumbersome. It was evident that the current model lacked nimbleness to respond to evolving practice.
- The change to the model eliminates the need to have multiple facilities at one practice to treat multiple species. The whole practice is accredited whether it is a hospital/office or mobile, or a combination of these.
- The new standards move to a more customized approach that acknowledges the unique ways that veterinary services are being delivered in Ontario.
- It recognizes that practices may meet the standards for their scope of practice in multiple different ways.
- It moves away from a one-size-fits all approach and focuses on mitigating risks in facilities that are both common among them and unique to their scope of services.
- An annual accreditation fee is paid by each practice. It supports a cost recovery model by covering the costs associated with the accreditation program including continuous improvement of the standards. It supports having veterinarian inspectors and their ongoing training and equalizes geographical costs of conducting inspections.

Based on recommendations made by the Accreditation Models Task Force, College Council at its June 2017 meeting approved a new accreditation model for a modern approach to accreditation of facilities and an inspection process that is flexible and responsive to evolving models of delivery of veterinary services. The outcomes-based approach to the standards for facilities includes inspectors who are veterinarians. At this meeting, Council directed the establishment of an Expert Advisory Group to draft new facility accreditation standards to support the new model. The group was tasked with drafting standards which reflect an outcomes-based approach and the services and scope of practice of the veterinary facility. The Expert Advisory Group, which consisted of 12-15 veterinarians representing different facility types and species groups, met for 18 months.

The Expert Advisory Group drafted new accreditation standards where a veterinary practice will need to meet and maintain a set of Essential Standards (ES), and Additional Scope of Practice Services (ASPS) standards selected by the Facility Director. The Additional Scope of Practice Services are standards that apply to a practice based on the scope of services they provide. If an Additional Scope of Practice Service does not apply to their scope of services, they do not select it for accreditation. If a standard does not specifically state the species type, it is assumed that it applies to all species.

In September 2019, Council reviewed the draft Standards for Veterinary Facilities in Ontario which were drafted by the Expert Advisory Group and are comprised of the Essential Standards and the Additional Scope of Practice Services. Council provided preliminary approval of the draft standards for pilot testing in 2020. Due to the pandemic, the pilot was postponed, however, was finally able to take place between April 1- October 12, 2022. The intent of the pilot was to permit on-the-ground feedback, provide a training opportunity for the new veterinarian inspectors, and based on pilot participant feedback, make potential revisions to the draft standards.

In July 2022, the proposed regulatory language related to accreditation sections of Regulation 1093 was approved by the Ontario government. The implementation of the new regulatory language streamlines the accreditation process and paves the way for introducing the new accreditation model and standards.

In December 2022, Council reviewed the pilot participant feedback and approved the draft standards and proposed amendments to the College's fee by-law be circulated for stakeholder consultation. The College recognizes the importance of stakeholder relationships and in addition to the broader consultation, the College did reach out to groups of members working with different species.

The draft Standards for Veterinary Facilities in Ontario and the proposed amendments to the College's fee by-law were out for public consultation, as directed by Council, from February 8 – April 8, 2023.

## Findings from Consultation

Respondents to the consultation could either provide their comments or answer survey questions via the College's website through the consultation page.

The College received 7 emails, 21 comments via the College's website, and 53 stakeholders completed the survey questions provided by the College regarding the proposed draft standards for veterinary facilities in Ontario.

The College received 19 responses to the proposed change to the College By-Laws Amendment – Schedule A – Fees. Fifteen (15) were unique responses about the fees.

In total the College received 100 responses.

The Ontario Veterinary Medical Association (OVMA) and Ontario Association of Veterinary Technicians (OAVT) also provided letters of feedback.

College staff held video calls with the representatives of the following associations to receive their feedback about the new draft standards:

- Small Ruminant Veterinarians of Ontario (SRVO)
- The Ontario Association of Bovine Practitioners (OABP)
- The Ontario Association of Equine Practitioners (OAEP)
- The Ontario Association of Poultry Veterinarians (OAPV)

## Response Rate

There are currently 1722 accredited practices and 5348 licensed veterinarians in Ontario. The stakeholder consultation was open to all licensed veterinarians in Ontario as well as external stakeholders.

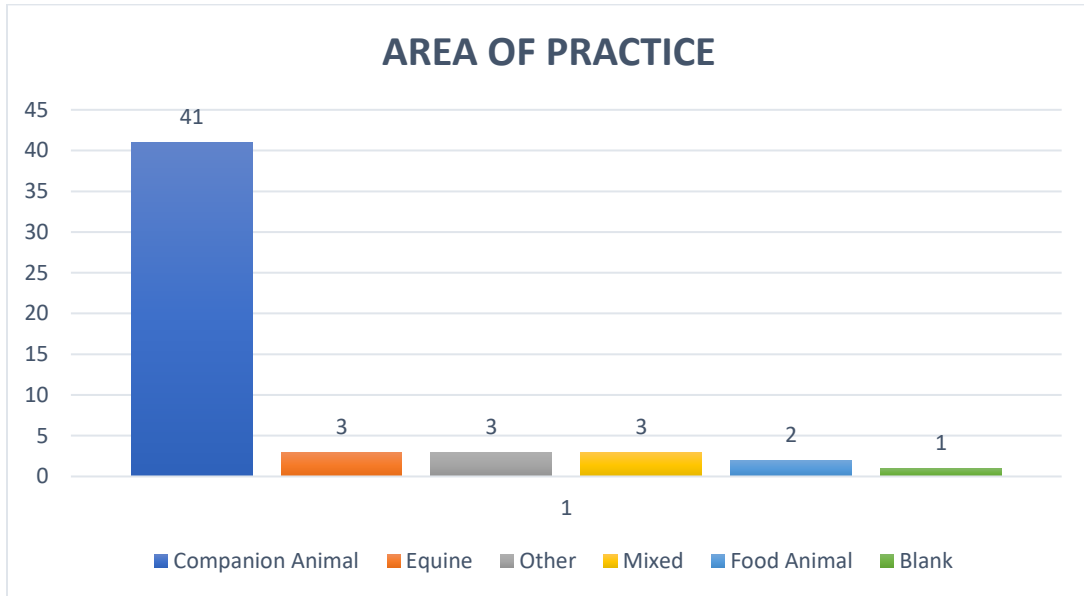
Less than two percent (2%) of licensed veterinarians responded to the consultation. Less than 2% of facility directors responded to the consultation.

While the response rate is low, the College was pleased to receive all feedback including feedback from the Ontario Veterinary Medical Association, species-specific association representatives and the Ontario Association of Veterinary Technicians.

## Demographics of Respondents

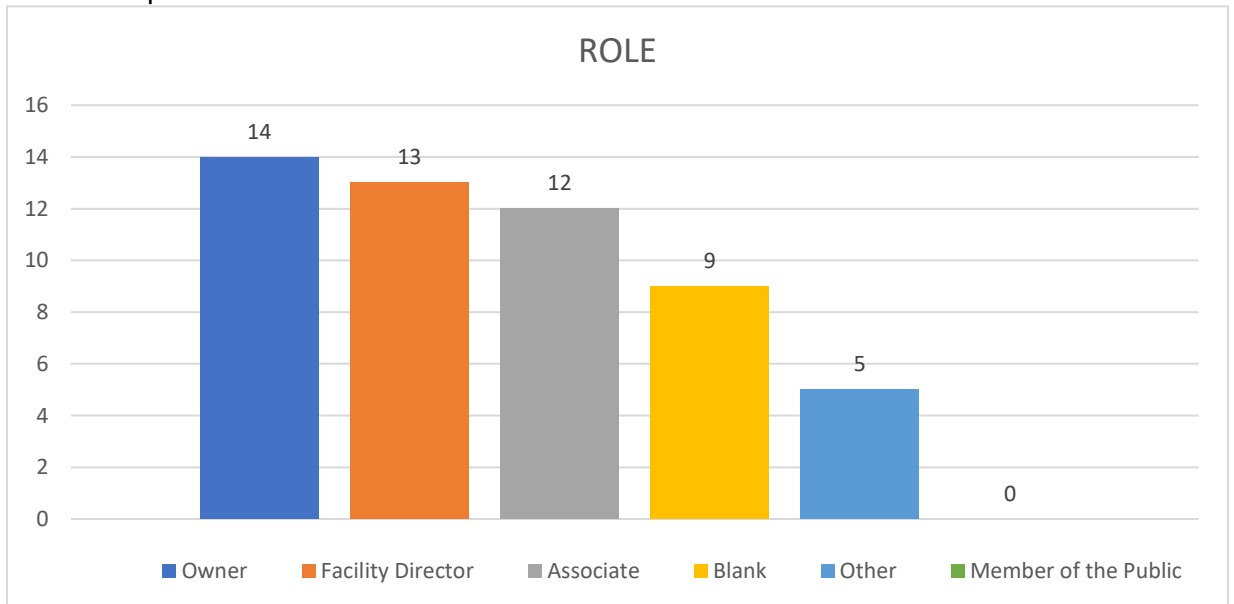
### i. Area of Practice

77% of the respondents' area of practice is companion animal and 15% of the respondents' area of practice is large animal.



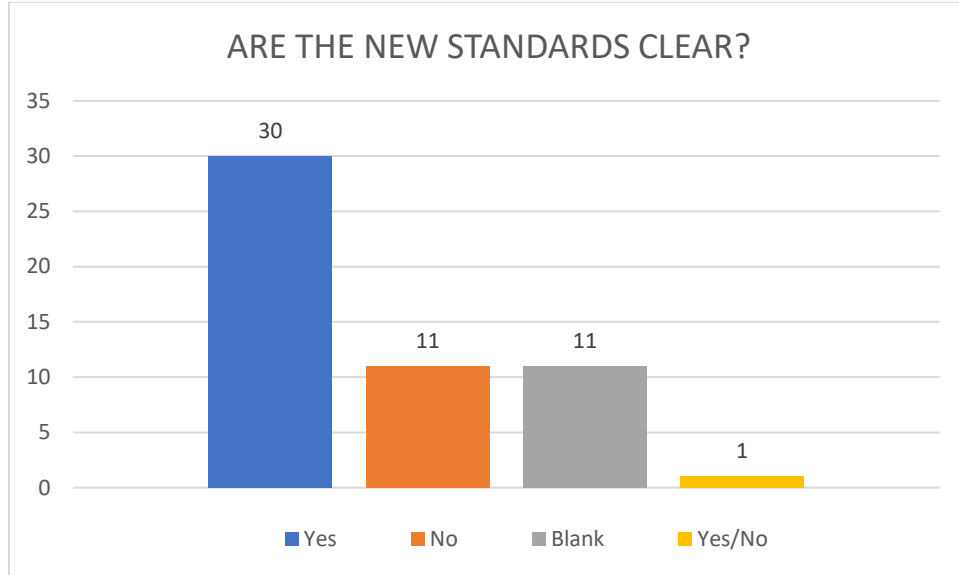
### 2. Role

26% of respondents are facility owners, 24% of respondents are facility directors and 22% of respondents are associates.

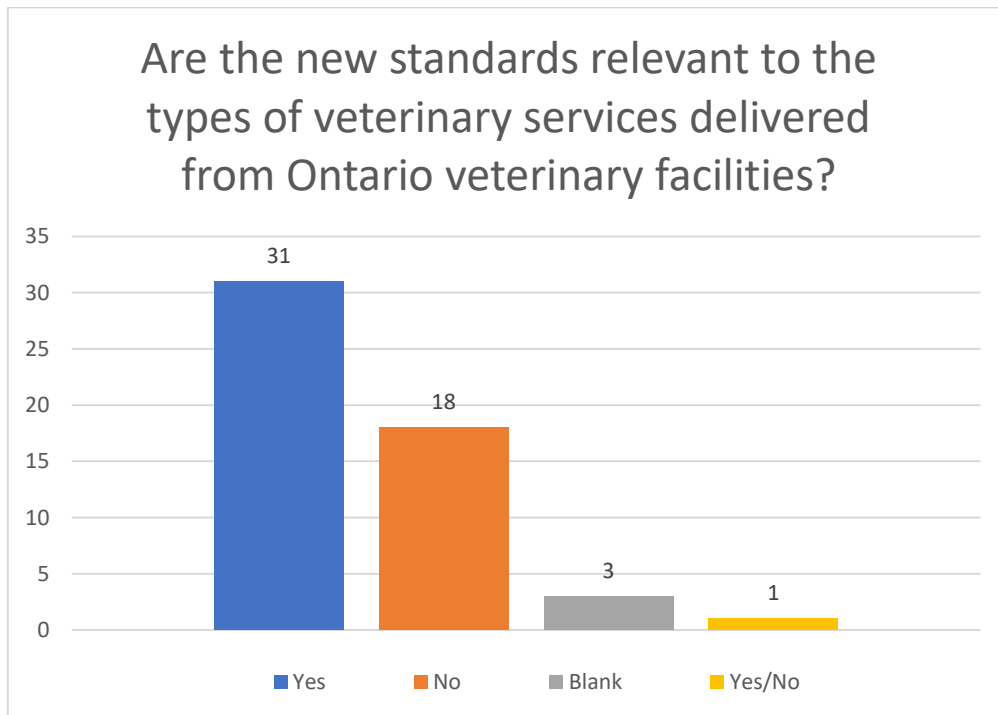


Survey Results:

The first question asked in the consultation was whether the new standards are clear. Fifty-seven percent (57%) of respondents said “Yes”, the new standards are clear and 21% of respondents said “No”.



The second question asked in the consultation was whether the new standards are relevant to the types of veterinary services delivered from Ontario veterinary facilities. Fifty-eight percent (58%) of respondents said “Yes” the new standards are relevant and 34% of respondents said “No”.



## Part A: Draft Standards for Veterinary Facilities in Ontario

### Analysis:

The following is a summary of the main themes of the feedback and comments received about the proposed standards:

- The standards document is long.
- They tend to be written for companion animal practices.
- Several standards are not easily applicable to large animal mobile practices.
- There is confusion about how to comply with the requirements and not enough information is provided in the guidance notes.
- Concerns about consistency between DVM inspectors and standardization of their inspections.
- Confusion that guidance notes are requirements rather than guidelines.
- Consideration of a different format for the standards so they are easier to read and understand.
- For safety management, consider whether worker safety needs to be included if covered under *Occupational Health and Safety Act*.
- For equine reproductive ultrasound imaging, should not have to save images
- Concern from large animal practices about requirement to conduct a weekly controlled drug audit.
- Concern related to emergency services being an Additional Scope of Practice Services Standard rather than an Essential Standard.

Based on the feedback, proposed revisions were made to the standards for Council's consideration. Most of the changes to requirements were minor wording edits to clarify the requirement. The majority of changes involved adjustments to the guidance notes to assist with understanding how to comply with the requirement.

### Highlights of revisions to the proposed draft standards:

- i. Use of the term Large Animal which now includes equine, food-producing animals and livestock.
- ii. Use of the term "team member" to include veterinarians, registered veterinary technicians, veterinary assistants, and administrative staff involved in veterinary care in or from the facility.
- iii. The format of the standards has changed to assist with readability and decreases the number of pages.
- iv. Since facility directors are familiar with the term "mobile", Additional Scope of Practice Services: Vehicle has been changed to Additional Scope of Practice Services: Mobile.
- v. Essential Standards - Facility Structure: revised to incorporate requirements of a base unit for mobile practices.
- vi. Essential Standards – Safety Management: proposed changes that focus the requirements on animal and public safety at the facility, rather than worker safety which is covered in *Occupational Health and Safety Act*.
- vii. Essential Standards – Pharmaceutical Management:

- A guideline for mobile practice is that there is a separate lockable area in the base unit to store controlled drugs.
  - A current verifiable monthly (every 30 days) inventory of controlled drugs is required.
- viii. Additional Scope of Practice Services - Anesthesia: Clarified in the objectives that this Additional Scope of Practice Services is applicable to practices that perform injectable or inhalant anesthesia on animal patients.
- ix. Additional Scope of Practice Services - Critical Care: removed Additional Scope of Practice Services – Emergency Care and revised Additional Scope of Practice Services – Intensive Care to now be called Additional Scope of Practice Services – Critical Care. Changing standard to Additional Scope of Practice Services – Critical Care provides clarity that this standard applies to hospital that treat animals with critical or life-threatening conditions that require constant monitoring.
- x. Additional Scope of Practice Services -Surgery
- In-Facility Surgical Suite for All Species (Hospitals): defined major surgery, added to guidelines that large animal surgical suites may contain an x-ray machine and added clarification around large animals.
  - Mobile for Large Animal Ambulatory Surgery: added that this applies to major surgical procedures for large animals outside of the surgical suite or in the field.
  - Surgical Mobile for Companion Animals: has a base unit, a mobile unit and a remote unit. The remote unit is a stationary element that is used for performing certain major surgical procedures with anesthesia (e.g. spays and neuters) on multiple companion animals in the same space and it can change locations to provide services in different communities in the province.
  - Clarified that cold sterile is not an acceptable sterilization method for surgical instruments to be used for major surgery.
- xi. Additional Scope of Practice Services -Ultrasound Imaging: added that saving and storing of ultrasound images may not be required or practical when ultrasound is used to assess reproductive status of large animals or to perform ultrasound guided procedures in all species. Also added to the beginning of some requirements “when diagnostic images are saved.”

### Council June 2023 Decision

The College Council approved the proposed changes to the standards for veterinary facilities in Ontario and decided to circulate them for a second targeted consultation.

### Part B: By-Law Changes to Accreditation Fees

The accreditation inspection fees are set out in the College’s By-laws. The last time inspection fees were reviewed was in 2012 when an increase in the inspection fees was approved by College Council. An annual fee model was proposed by the Accreditation Models Task Force in their recommendations to Council on a cost-effective, contemporary model for facility accreditation; that is, a fee will be paid per practice on an annual (yearly) basis. The proposed facility accreditation model went out for stakeholder consultation in October 2017. Based on the



stakeholder consultation report, Council decided that the concept of the annual fee would remain in the new model, since it addresses the fiscal responsibility to support the operational costs of the Accreditation Program as a whole, not just singular facility inspection fees.

The annual fee reflects the scope of services offered from the practice as a whole and eliminates the per facility inspection fee. There will no longer be a facility inspection fee paid at the time of an inspection. Also, other accreditation fees have been added or changed to reflect the new approach to accreditation including a change to veterinarian inspectors and standards reflecting the scope of services provided at the practice. Overall, there will be a moderate increase in the accreditation fees to support the new model.

In April 2020, College staff presented a proposed annual fee structure to the Accreditation Committee. The Committee reviewed and in theory approved the annual fee structure presented. The benefit of an annual fee is it will support the Accreditation Program in the following manner:

It will,

- Support ongoing training for the DVM inspectors
- Allow for the continuous improvement of the facility standards
- Equalize geographical costs
- Reinforce the importance of continuous application of the facility standards
- Support a cost recovery model, supporting the operational costs of the Accreditation Program as a whole
- There will no longer be a per inspection fee

The new standards are no longer based on the facility types; instead, the new standards represent the services provided from the practice as a whole. The annual fee that is paid reflects the scope of services offered from that individual practice location.

There will also be other fee changes associated with the new accreditation model. These include a late annual fee penalty, unannounced inspection fee, new facility inspection fee, incomplete inspection fee, cancellation and re-scheduling fee, and failure to notify fee.

In November 2022, the Accreditation Committee reviewed the proposed annual fee structure and approved the proposed changes to the by-laws for accreditation fees for Council's consideration.

#### Analysis: Consultation Feedback on By-Law Changes to Accreditation Fees

Feedback from the consultation indicated an overall disapproval for the proposed annual fee and other fees, and confusion as to how a practice would determine the annual fee they have to pay.

The following is a summary of the themes of the feedback about the proposed accreditation fees:

- Disagreement with having unannounced inspections
- Disagree with the annual fee

- Seems excessive
- Fee for inspection should be lowered
- Fees should be kept in accordance with inflation only
- It is not clear what the fees will be
- Feel there should be a reduction in fees for those facilities that only provide veterinary care to their own animals
- Annual accreditation fees add more administrative work
- Fees appear to be reasonable

Based on the feedback on the annual accreditation fee, it is not surprising that respondents were not supportive of an increase in fees for accreditation. The feedback highlighted the need for additional clarification on how the annual accreditation fee is calculated for an individual practice based on the Essential Standards and the number of Additional Scope of Practice Services that need to be accredited.

The College posted a comment on the public consultation tool on the website to clarify any potential misunderstanding about unannounced inspections. The College has always had the ability to conduct unannounced inspections. This is based on Section 50 of Ontario Regulation 1093 and the Accreditation Committee may place a condition on a Certificate of Accreditation for unannounced inspections. The proposed by-law changes include a fee for unannounced inspections. The new accreditation model will not introduce random inspections.

Further communication will be planned for facility directors to ensure there is understanding of the accreditation fees.

The projected costs of the new accreditation program were used to determine the proposed fees. After the program has been running for two years, the College will re-evaluate and re-adjust the fees as necessary.

#### Council June 2023 Decision

Council approved the by-law changes to the accreditation fees as proposed with an implementation date of October 1, 2023.

#### **SUMMARY**

The College of Veterinarians of Ontario has had a robust accreditation process in place for decades. This profession is one of few granted the privilege of facilities inspection. While the current accreditation model has served the public and the profession well, there were emerging issues which raised questions as to its suitability for the future. Such areas of concern included:

- The increasing categories of facility types raise questions as to the accreditation model's complexity;
- The need for some licensed members in mixed practice to hold multiple facility types;
- The ever-evolving practice environment which requires a nimble and responsive approach to accreditation;

- The increasing requests at the Committee level for exemptions, speaking again to nimbleness in a changing environment; and,
- The challenge of setting reasonable fees that assure program sustainability.

This accreditation model meets the recommendations of the Accreditation Models Task Force for a modern approach to accreditation of facilities and an inspection process that is flexible and responsive to evolving models of delivery of veterinary services. The outcomes-based approach to the standards for facilities includes inspectors who are veterinarians, and practices are accredited based on the scope of services they provide. Further, the emphasis will be on the standards being a “living” document and the standards will be reviewed regularly by the Accreditation Committee to ensure they are evolving with practice over time.

An annual accreditation fee paid by each practice replaces the per inspection fee for each facility type in the practice. While the College acknowledges that the cost for inspections will increase in the new accreditation model it supports a cost recovery model by covering the costs associated with the accreditation program including continuous improvement of the standards. It supports having veterinarian inspectors and their ongoing training and equalizes geographical costs of conducting inspections. After the program has been running for two years, the College will re-evaluate and re-adjust fees as necessary.

The College recognizes that the new model is a substantial change from the current accreditation process. The College is developing a variety of resources, tools, and supports for Facility Directors to assist them in understanding the new model of accreditation, how to comply with the new standards, and how to prepare for an inspection.